

1 **GEORGE M. RANALLI, ESQ.**
Nevada Bar No. 5748
2 **BENJAMIN J. CARMAN, ESQ.**
Nevada Bar No. 012565
3 **RANALLI ZANIEL FOWLER & MORAN, LLC**
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5 Attorney for Defendant,
CSAA GENERAL INSURANCE COMPANY

6 **UNITED STATES DISTRICT COURT**

7 **DISTRICT COURT OF NEVADA**

8 **JONI LeGALLEY, an individual,**

2:17-CV-01232-JAD-VCF

9 Plaintiff,

10 v.

11 **CSAA GENERAL INSURANCE COMPANY**
12 **a Foreign Entity aka AAA NEVADA**
13 **INSURANCE COMPANY aka AAA**
14 **INSURANCE; AMERICAN AUTOMOBILE**
15 **ASSOCIATION OF NORTHERN**
16 **CALIFORNIA, NEVADA & UTAH, aka**
17 **AAA NEVADA INSURANCE COMPANY**
18 **AAA INSURANCE; a Foreign**
19 **Entity; and ROES I through X,**

20 Defendants.

21 **STIPULATION AND ORDER TO EXTEND DISCOVERY DEADLINES**

22 **(SECOND REQUEST)**

23 IT IS HEREBY STIPULATED AND AGREED by Plaintiff, JONI
24 LeGALLEY, and Defendant, CSAA GENERAL INSURANCE COMPANY a
Foreign Entity aka AAA NEVADA INSURANCE COMPANY aka AAA
INSURANCE, hereinafter CSAA GENERAL INSURANCE COMPANY to Extend
Discovery Deadlines by ninety days.

A. STATEMENT SPECIFYING THE DISCOVERY COMPLETED:

1. Plaintiff's initial disclosures pursuant to FRCP 26;
2. Defendant American Automobile Association of Northern
California, Nevada & Utah disclosures pursuant to FRCP
26;
3. Defendant CSAA General Insurance Company a foreign entity
disclosures pursuant to FRCP 26; (to be disclosed this
week);
4. Plaintiff's Request for Production of Documents to
American Automobile Association of Northern California,
Nevada & Utah;
5. Defendant American Automobile Association of Northern
California, Nevada & Utah Response to Plaintiff's Request
for Production of Documents;
6. Defendant American Automobile Association of Northern
California, Nevada & Utah First Supplemental Response to
Plaintiff's Request for Production of Documents;
7. Plaintiff's Request for Production of Documents to CSAA
General Insurance Company;
8. Defendant CSAA General Insurance Company Response to
Plaintiff's Request for Production of Documents;
9. Plaintiff's first supplemental disclosures pursuant to
FRCP 26;
10. Defendant CSAA General Insurance Company a foreign
entity first supplemental disclosures pursuant to FRCP

26;

11. Defendant CSAA General Insurance Company a foreign
entity second supplemental disclosures pursuant to FRCP
26;

12. Plaintiff's Responses to Defendant, CSAA's Request for
Admissions;

13. Plaintiff's Responses to Defendant, CSAA's
Interrogatories;

14. Plaintiff's Responses to Defendant, CSAA's Request for
Production of Documents;

15. Plaintiff's Expert Witness Disclosures;

16. Defendant's Designation of Expert Witnesses and
Documents;

17. Defendant's First Supplemental Designation of Expert
Witnesses and Documents;

**B. A SPECIFIC DESCRIPTION OF THE DISCOVERY THAT REMAINS TO BE
COMPLETED:**

Defendant, CSAA will scheduling the depositions of the
Plaintiff, along with the depositions of Plaintiff's treating
providers and potential witnesses. Plaintiff will be scheduling
the deposition of Defendant's Rule 30(b)(6) witness and adjuster
on the file. Plaintiff intends to take the depositions of
Defendant's expert(s).

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1 C. REASONS WHY DISCOVERY HAS NOT BEEN COMPLETED WITHIN
2 THE TIME LIMITS SET BY THE DISCOVERY ORDER.

3 Both parties have been working diligently to complete all
4 discovery in a timely manner. However, parties have been having
5 trouble getting dates from doctors within a reasonable time
6 frame for depositions. This was despite efforts beyond two
7 months to obtain dates that would accommodate the schedules of
8 the doctors and counsel, and was not the result of any last
9 minute scheduling efforts.

10 Further, Plaintiff's counsel has been in and out of state
11 for a trial and will be continuing to travel in and out for
12 state for trial throughout February, March, and April.

13 The parties believe that a ninety day extension will allow
14 both parties to complete all remaining discovery and resolve all
15 the issues they have been having with scheduling conflicts as
16 well.

17 D. PROPOSED SCHEDULE FOR COMPLETING DISCOVERY:

18 The parties have agreed to the following modified
19 deadlines:

20	Discovery Cut off:	01/19/2018	04/19/2018
21	Expert Disclosure:	11/20/2017	CLOSED
22	Rebuttal of Experts:	12/20/2018	CLOSED
23	Interim Status Report:	11/20/2017	CLOSED
24	Dispositive Motions:	02/19/2018	03/21/2018 5-21-2018
	Pre Trial Order:	03/21/2018	04/20/2018 6-20-2018

1 F. SAID REQUEST IS NOT BEING MADE FOR PURPOSES OF UNDULY
2 DELAYING DISCOVERY OR THE TRIAL OF THIS MATTER.

3
4 Dated: January 18th, 2018

Dated: January 18th, 2018

5 RANALLI ZANIEL FOWLER & MORAN,
6 LLC

MINCIN LAW, PLLC

7 /s/ Benjamin J. Carman

s/ David Mincin

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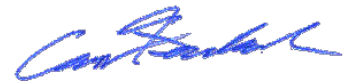
Attorneys for Defendant
11 CSAA GENERAL INSURANCE COMPANY

Attorney for Plaintiff

12
13 **ORDER**

14 IT IS SO ORDERED:

15 Dated: 1-18-2018



16 UNITED STATES MAGISTRATE JUDGE
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